

**UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	BANKRUPTCY CASE NO.
	§	
PRIME ECO GROUP, INC., ETC.	§	21-32560
	§	
DEBTOR	§	Chapter 11

**EMERGENCY MOTION TO CONTINUE THE CONFIRMATION
HEARING DATE AND OBJECTION AND BALLOTING DEADLINE**

IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-ONE DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.

IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY-ONE DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW PRIME ECO GROUP, INC, ET AL, Debtors, and file this their Emergency Motion to Continue The Confirmation Hearing Date and Objection and Balloting Deadline, and in support thereof would respectfully state as follows:

1. Movants are the Debtors and Debtors in Possession herein.

2. This chapter 11 bankruptcy proceeding was filed on July 30, 2021. PRIME ECO GROUP, INC. owns land and buildings at the business location in Wharton County, Texas.

3. Among others, the Debtors are indebted to Austin Financial Services, Inc., the Small Business Administration, and Fairview Investment Fund V, LP. Fairview Investment Fund V, LP is the lender for the land and the buildings.

4. On August 2, 2022, one of the Debtors' buildings, building #3, which is a warehouse, with an old and outdated inventory of chemicals, caught fire and has been destroyed. On or about August 7-8, 2022, the buyer of the land and buildings canceled the purchase contract and leaseback agreement.

5. The Debtors' real estate broker, George Froming of Forge Real Estate Group, LLC, believes that he can obtain another purchase contract and lease, but needs the Debtors to clean up and dispose of the steel from the destroyed building #3 along with the old inventory of chemicals before he starts showing the land and buildings. This cleanup needs to be coordinated with the Fire Department investigators who will be starting their investigation soon, along with the insurance company. It will take a while to clean up and dispose of building #3 materials once the investigators are finished and the insurance company makes a decision on the amounts to be paid to the Debtors for the damage. As can be seen from the attached photographs, buildings 1 and 2, as well as the tank farms are operational and were not involved in the fire.

6. The confirmation hearing is set for August 30, 2022, and the objection/balloting deadline is August 23, 2022. This motion is filed as an emergency motion because the hearing is within 21 days.

7. Counsel contacted the attorneys for the SBA, AFS and Fairview, and suggested that the Debtors need at least 60 days to not only get everything cleaned up, but to also start showing the land and buildings in order to obtain a purchase agreement and lease. The Debtors believe that the plan most likely cannot be confirmed as between the Debtors and Fairview without a purchase agreement and lease. The use of the land and buildings are absolutely necessary for the continued operation of the business. Sixty days may be insufficient, but it's a start. The Debtors probably will need 120 days, depending on the market. If more than 60 days is necessary, the Debtors will contact the creditors and the court regarding an extension.

WHEREFORE, premises considered, the Debtors respectfully move this Honorable Court to approve the Debtors' motion for a continuance of the confirmation hearing and objections/balloting deadlines, and for such other and further relief as is just.

Respectfully submitted,

/s/ Margaret M. McClure
MARGARET M. MCCLURE
State Bar No. 00787997
25420 Kuykendahl Rd, Suite B300-1043
The Woodlands, Texas 77375
(713) 659-1333
(713) 658-0334 (fax)
E-mail: Margaret@mmmccclurelaw.com

ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was served on all parties in interest as set out on the attached matrix either electronically or by U.S. mail or fax on August 11, 2022.

/s/ Margaret M. McClure
MARGARET M. MCCLURE







Bldg 2



Bldg 2 Tank Farm



**Bldg 2
Mixing
Equipment**



**Inside
Bldg 2**

Bldg 1



Label Matrix for local noticing
0541-4
Case 21-32560
Southern District of Texas
Houston
Fri Jul 30 12:27:43 CDT 2021

American Express
200 Vesey Street
New York, NY 10285-0002

Citibank Visa
399 Park Avenue
New York, NY 10285-0001

DoerenMayhew
Attn: Jason Alvarez
One Riverway Drive, Suite 1200
Houston, TX 77056-1936

Fairview Partners Investment Management, LLC
Attn: Nels Stem
119 South Main St., Suite 410
Seattle, WA 98104-2592

Iberia Visa
285 W Esplanade Avenue
Kenner, LA 70065-2488

Precision Additives, Inc.
Attn: Don Syvester
1441 Park Ten Blvd.
Houston, TX 77084-5028

Prime Eco Supply, LLC
2933 State Highway 60 South
Wharton, TX 77488-8416

SNF Holding Company
Attn: Reginald Lee
1 Chemical Plant Road
Riceboro, GA 31323-3253

Texas Comptroller of Public Accounts
Audit Division Headquarters
1700 N Congress, Suite 300
Austin, TX 78701-1436

Prime Eco Group, Inc.
P.O. Box 431
Wharton, TX 77488-0431

Austin Financial Services, Inc.
Attn: Tom Derenze
11111 Santa Monica Blvd., Suite 1000
Los Angeles, CA 90025-3344

(p)CITY OF BIG SPRING
ATTN CITY ATTORNEY
310 NOLAN STREET
BIG SPRING TX 79720-2657

Fairview Investment Fund V, LP
Attn: Nels Stem
119 South Main St., Suite 410
Seattle, WA 98104-2592

Fernando Guzman
P.O. Box 431
Wharton, TX 77488-0431

Integrity Delaware, LLC
Attn: Cyndie Dreyer
1607 Junction Highway
Kerrville, TX 78028-9300

Premier Oilfield Laboratories, LLC
Attn: Chisa Jackson
Dept. 3893, P.O. Box 123898
Dallas, TX 75312-3898

Rosario Guzman
P.O. Box 431
Wharton, TX 77488-0431

Streamline Polymers, LLC
Attn: Patti Goin
16950 Wallisville Road
Houston, TX 77049-5014

(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

4
United States Bankruptcy Court
PO Box 61010
Houston, TX 77208-1010

CMI / Hoover Materials Handling
Attn: Dan Cartel
414 Sansom Street
Upper Darby, PA 19082-2232

Dana Leasing System
Attn: Bonnie Spyer
P.O. Box 74319
Cleveland, OH 44194-0002

Fairview Investment Fund V, LP
c/o Jason D. Kraus
19500 State Highway 249, Suite 350
Houston, TX 77070

Guide Energy Solutions, LLC
Attn: Gina Richardson
9330 S Highway 99
Prague, OK 74864-1260

M&M Protection, LLC
Attn: Ashley Verhage
11831 West Fairmount Parkway
La Porte, TX 77571-6003

Prime Eco Polychem, LLC
P.O. Box 431
Wharton, TX 77488-0431

SASOL North America, LLC
Attn: Kevin Menchaca
P.O. Box 201344
Dallas, TX 75320-1344

Texas Comptroller of Public Accounts
111 E. 17th Street
Austin, TX 78774-0100

Texas Comptroller of Public Accounts
c/o Office of the Attorney General
P.O. Box 12548
Austin, TX 78711-2548

U.S. Small Business Administration
10737 Gateway West, Suite 300
El Paso, TX 79935-4910

U.S. Small Business Administration
1545 Hawkins Blvd., Suite 202
El Paso, TX 79925-2654

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Water Mark Technologies, Inc.
Attn: Kim Logsdon
9 West Main Street
Mendham, NJ 07945-1220

Wharton County, et al
308 E. Milam Street
Wharton, TX 77488-5024

Wharton County, et al
Attn: Cindy Hernandez
P.O. Box 189
Wharton, TX 77488-0189

Wharton County, et al
c/o McCreary, Veselka, Bragg & Allen, PC
P.O. Box 1269
Round Rock, TX 78680-1269

Wharton County, et al
c/o Mr. John P. Dillman
P.O. Box 3064
Houston, TX 77253-3064

Margaret Maxwell McClure
Attorney at Law
25420 Kuykendahl
Suite B300-1043
The Woodlands, TX 77375-3405

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

City of Big Spring
310 Nolan Street
Big Spring, TX 79720

Texas Comptroller of Public Accounts
P.O. Box 149359
Austin, TX 78714-9359

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Prime Eco Group, Inc.
P.O. Box 431
Wharton, TX 77488-0431

End of Label Matrix	
Mailable recipients	38
Bypassed recipients	1
Total	39